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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TESLA, INC., a Delaware corporation,
Plaintiff,

vs.

MARTIN TRIPP, an individual,
Defendant.

AND RELATED COUNTERCLAIMS

Case No. 3:18-cv-00296-LRH-CLB

**STIPULATION AND [PROPOSED]
MODIFICATION TO BRIEFING
SCHEDULE RE MOTION TO
COMPEL THE DEPOSITION OF
ELON MUSK**

(SECOND REQUEST)

Pursuant to Local Rule IA6-1, Plaintiff and Counter-Defendant Tesla, Inc. (“Tesla”) and Defendant and Counter-Plaintiff Martin Tripp (“Tripp”) submit the following Stipulation and Proposed Modification to Briefing Schedule re Motion to Compel the Deposition of Elon Musk. This is the parties second request for an extension to the briefing schedule.

The parties previously agreed and the Court approved, a briefing schedule on Tripp’s motion to compel the deposition of Elon Musk (the “Motion”) as follows: Tripp to file motion by October 18, 2019; Tesla to file opposition by November 18, 2019; Tripp to file reply by December 4, 2019; and telephonic hearing on December 13, 2019 at 9:00 a.m. (ECF 109.) Due Mr. Musk’s extensive international travel, Tesla requires an additional two days to finalize its opposition. Thus, the parties submit that good cause exists for a two-day extension of the filing date of the opposition. **This stipulation does not affect the filing date for the reply or the date for the telephonic hearing.**

For the foregoing reasons, the parties stipulate and respectfully request that the briefing schedule on Tripp’s motion to compel the deposition of Elon Musk be modified as follows:

1. Tesla shall file its opposition to the motion to compel by November 20, 2019.
2. The dates for any reply brief and the telephonic hearing shall remain unchanged.

Dated: November 15, 2019

CHARIS LEX P.C.

By: /s/ Sean P. Gates

Sean P. Gates

Attorneys for Plaintiff and
Counter-Defendant Tesla, Inc.

Dated: November 15, 2019

TIFFANY & BOSCO, P.A.

By: /s/ William Fischbach

William Fischbach

Attorneys for Defendant Martin Tripp

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ORDER

IT IS SO ORDERED:

HON. CARLA BALDWIN
UNITED STATES MAGISTRATE JUDGE

DATED: _____